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Filing date: **06/30/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91199242
Party	Plaintiff Emanuel Ungaro Italia S.r.l.
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Submission	Stipulated/Consent Motion to Extend
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Signature	/Ralph H. Cathcart/
Date	06/30/2011
Attachments	Sarah Joy Giovinetti - Motion on Consent for Extension of Discovery and Trial Deadlines.pdf ( 3 pages )(105223 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

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Emanuel Ungaro Italia S.r.l.,	:	Opposition No. 91,199,242
	:	
Opposer,	:	Serial No. 85/010,886
	:	
v.	:	
	:	
Sarah Joy Giovineti,	:	
	:	
Applicant.	:	
-----	X	

**MOTION ON CONSENT FOR EXTENSION  
OF DISCOVERY AND TRIAL DEADLINES**

Opposer hereby respectfully requests, with Applicant's consent, a ninety (90) day extension of Discovery and Trial Deadlines. Initial Disclosures are currently due on July 10, 2011, Emanuel Ungaro Italia S.r.l. requests that such date be extended for 90 days, or until October 8, 2011, and that all subsequent dates be reset accordingly as follows:

Time to Answer:	CLOSED
Discovery Conference:	CLOSED
Discovery Opens:	CLOSED
Initial Disclosures Due:	October 8, 2011
Expert Disclosures Due:	February 5, 2012
Discovery Closes:	March 6, 2012
Plaintiff's Pretrial Disclosures:	April 20, 2012
Plaintiff's 30-day Trial Period Ends:	June 4, 2012
Defendant's Pretrial Disclosures:	June 19, 2012
Defendant's 30-day Trial Period Ends:	August 3, 2012
Plaintiff's Rebuttal Disclosures:	August 18, 2012
Plaintiff's 15-day Rebuttal Period Ends:	September 17, 2012

The additional time is needed because the parties are engaged in bilateral settlement discussions and Opposer and Applicant are currently considering terms to be incorporated in a written co-existence agreement.

Counsel for applicant, Daniel S. Kirshner, Esq., has consented to the extension requested herein.

Respectfully submitted,

LADAS & PARRY LLP

Attorneys for Opposer,  
Emanuel Ungaro Italia S.r.l.

Dated: June 30, 2011

By:

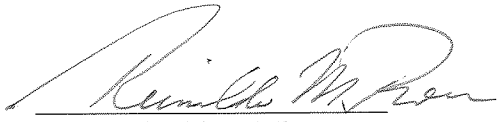
A handwritten signature in dark ink, appearing to read "Ralph H. Cathcart", is written over a horizontal line.

Ralph H. Cathcart  
1040 Avenue of the Americas  
New York, New York 10018  
(212) 708-1860  
(Our Ref: C10627480)

**CERTIFICATE OF TRANSMISSION**

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing **MOTION ON CONSENT FOR EXTENSION OF DISCOVERY AND TRIAL DEADLINES** has been electronically transmitted to the United States Patent and Trademark Office on the date indicated:

Dated: June 30, 2011

  
Reinaldo M. Roa

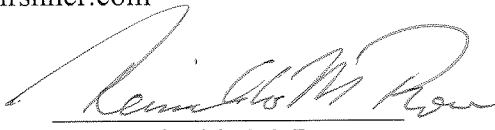
**CERTIFICATE OF SERVICE**

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing **MOTION ON CONSENT FOR EXTENSION OF DISCOVERY AND TRIAL DEADLINES** was served on the following person via first-class mail, as follows:

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Dated: June 30, 2011

  
Reinaldo M. Roa